

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ROBERT KIERNAN,

Plaintiff,

10 CV 06068 (VLB)

**DEFENDANTS' FIRST
SET OF
INTERROGATORIES**

-against-

THE VILLAGE OF MONTGOMERY, STEVEN BRESCIA,
MAYOR OF THE VILLAGE OF MONTGOMERY,
JOHN J. BYRNES, JR., individually and in his capacity as
officer in charge of the POLICE DEPARTMENT OF THE
VILLAGE OF MONTGOMERY, JOHN LUFFMAN,
individually and in his capacity as A POLICE OFFICER,
JO ANN SHEELS, AS A MEMBER OF THE BOARD OF
TRUSTEES OF THE VILLAGE OF MONTGOMERY,
DARLENE ADOLSEK, AS A MEMBER OF THE BOARD OF
TRUSTEES OF THE VILLAGE OF MONTGOMERY,
BRANDON JACKOB, AS A POLICE OFFICER OF THE
VILLAGE OF MONTGOMERY, THE BOARD OF
TRUSTEES OF THE VILLAGE OF MONTGOMERY,
JOHN DOES 1-4 and JANE DOES 1-4.

Defendants.
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PLEASE TAKE NOTICE that plaintiff is hereby required to serve on the
undersigned separate answers, under oath and notarized, to each of the following
Interrogatories:

1. Set forth names, addresses and phone numbers, if available, for all persons
claimed by plaintiff to be witnesses to any events set forth in plaintiffs' complaint
with identification as to which such event it will be claimed the person so named
witnessed.
2. Set forth the dates of all arrests of plaintiff including those prior or subsequent to
the incidents at issue herein, and provide the names of arresting officers, the

departments to which they belonged, and the results of any prosecutions therefore.

3. Describe in detail those actions of each defendant which it will be claimed by the plaintiff constituted wrongdoing or which serve as the basis for any of the claims made by the plaintiffs herein.
4. Set forth with specificity each injury and/or other item of damage allegedly suffered by the plaintiffs as a result of the events set forth in plaintiffs' complaint.
5. If plaintiff claims lost wages, set forth the names and addresses of plaintiff's employers together with names of any direct supervisors thereat.
6. If plaintiff claims personal injury, describe each personal injury claimed and set forth with specificity each action of each defendant which allegedly led to such injury and how it is plaintiff will claim that such injury was caused by defendants.
7. If plaintiff claims personal injury, set forth the names and addresses of any treating physicians and/or hospitals and the dates of such treatment with confinement dates to hospitals, if applicable.
8. If plaintiff claims injury other than personal injury, describe each such injury and set forth with specificity how it is plaintiff will claim that such injury was caused by defendants.
9. If it is claimed by plaintiff that he was caused to suffer expenses of any kind including attorneys' fees, as a result of the actions of the defendants, set forth the names and addresses of all persons or entities to whom payments of any kind were made as a result of the actions of defendants with dates and details of those services rendered in exchange for such payments.

DATED: White Plains, New York
June 27, 2011

Yours, etc.,

HODGES, WALSH & SLATER LLP

By: 

JOHN J. WALSH (4092)

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